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August 15, 2023

## Via ECF

The Honorable Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: *Ramirez v. Liberty One Group LLC et al.*  
Case No.: 1:22-cv-05892 (KPF)

Dear Judge Failla:

We are counsel to Plaintiff in the above referenced matter. We write jointly with Defendants to request a stay of all discovery and interim deadlines, *sine die*, in the above referenced action pending the parties' completion of a mediation.

This is the parties' first joint request for a stay of discovery. The parties request this stay as the parties have agreed to attend private class mediation with Christopher Kwok, Esq., and the parties now wish to conserve resources and devote full attention to mediation, which is scheduled for September 21, 2023, and will be held virtually.

Additionally, the parties request leave to provide the Court with a status update two weeks following the private class mediation to inform the court whether the parties have resolved the matter, or to request that the Court re-open discovery.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF

Application GRANTED. The conference scheduled for September 26, 2023 is hereby ADJOURNED *sine die*. The parties are ORDERED to file an update on the status of their mediation efforts on or before **October 25, 2023**. If mediation is unsuccessful, the Court will promptly reset the outstanding discovery deadlines.

The Clerk of Court is directed to terminate the motion at docket entry 43.

Dated: August 15, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE